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March 25, 1985



VIRGINIA POWER

Dr. J. Nelson Grace
Regional Administrator
Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30323

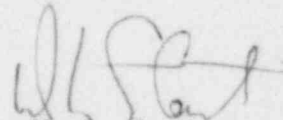
Serial No. 85-154
NO/sbe
Docket Nos. 50-338
50-339
License Nos. NPF-4
NPF-7

Dear Dr. Grace:

We have reviewed your letter of February 22, 1985, in reference to the inspection at North Anna Power Station conducted from January 6 to February 5, 1985 and reported in IE Inspection Report 50-338/85-01 and 50-339/85-01. Our response to the Notice of Violation is addressed in the attachment.

We have determined that no proprietary information is contained in the report. Accordingly, Virginia Power has no objection to this inspection report being made a matter of public disclosure. The information contained in the attached pages is true and accurate to the best of my knowledge and belief.

Very truly yours,



W. L. Stewart

Attachment

cc: Mr. Roger D. Walker, Acting Director
Division of Reactor Projects

Mr. James R. Miller, Chief
Operating Reactors Branch No. 3
Division of Licensing

Mr. M. W. Branch
NRC Resident Inspector
North Anna Power Station

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RESPONSE TO NOTICE OF VIOLATION
ITEM REPORTED DURING NRC INSPECTION
CONDUCTED FROM JANUARY 6 TO FEBRUARY 5, 1985
REPORT 50-338/85-01 AND 50-339/85-01

NRC COMMENT

Channel Check as defined in Section 1.4 of the Technical Specifications, states, in part, "A Channel Check shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indication and/or status derived from instrumentation channels measuring the same parameter."

Technical Specification 4.3.1.1.1 requires in Table 4.3-1 that overtemperature Delta T and overpower Delta T protection be verified operable every 12 hours by the performance of a Channel Check. Additionally, technical specification 4.3.3.5 requires in table 4.3-6 that auxiliary shutdown panel steam generator level be verified operable every 31 days by the performance of a Channel Check.

Contrary to the above, the licensee failed to meet the surveillance requirements in that:

- A. Unlike parameters were compared when performing the Channel Checks of Delta T instruments TI-1-412A, TI-1-422A and TI-1-432A (TI-2-412, TI-2-422A and TI-2-432A for Unit 2)
- B. When performing the Channel Checks of Steam Generator Level instrument LI-1477B, LI-1487B and LI-1497B (LI-2477B, LI-2487B and LI-2497B for Unit 2) unlike parameters were also compared.

This is a Severity Level IV violation and applies to both Units.

RESPONSE

1. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

This violation is correct as stated.

2. REASON FOR THE VIOLATION

This violation was the result of a procedural error. For overtemperature Delta T the procedure incorrectly required the comparison of these channels which were not normalized to full power and did not have inherent independence from the other channels. For the single Steam Generator wide range level indication, the procedure incorrectly required comparison between generators.

3. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Each loop Delta T protection channel was rescaled to core power. This established a normalization of the channel error to the actual core conditions. As such, the channels now independently measure like parameters and meet the Technical Specification requirement for a channel check.

4. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A study of the channel checks, required to meet Technical Specification requirements, is being conducted to identify any additional areas in which unlike parameters are compared. To date, no additional items have been identified. In addition, a comparison of the Channel Check allowed tolerance to the tolerance used in the UFSAR is being made to ensure compliance with the assumptions of the safety analysis.

The periodic test that establishes loop specific values of Delta Temperature will be revised to require rescaling of these channels following each refueling outage.

The periodic tests that incorrectly required the comparison of the Steam Generator level channels will also be revised to ensure the Channel Checks are made to specific loops.

5. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The study and the procedure revisions will be completed by April 30, 1985.